## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

Daniel Gordon, et al.,

Plaintiffs,

v.

Amadeus IT Group, S.A., Amadeus North America, Inc., Amadeus Americas, Inc., Sabre Corporation f/k/a Holdings Corporation, Sabre Holdings Corporation, Sabre GLBL Inc., Sabre Travel International Limited, Travelport Worldwide Limited, and Travelport LP d/b/a Travelport,

Defendants.

Civ. A. No. 1:15-cv-05457-KPF

**ECF** Case

## DECLARATION OF STEVEN J. KAISER IN SUPPORT OF DEFENDANTS' JOINT MOTION TO DISMISS THE AMENDED COMPLAINT

- I am an attorney at the law firm of Cleary Gottlieb Steen & Hamilton LLP, counsel for
  defendants Sabre GLBL Inc., Sabre Holdings Corp., and Sabre Travel International Ltd.
  I have personal knowledge of the following and, if called upon to testify, could and
  would do so competently as to the accuracy of the matters stated herein.
- 2. Attached hereto as Exhibit A is a true and correct copy of the Transcript of Motion to Dismiss Hearing, *Cornelison v. Visa USA*, *Inc.*, No. Civ03-1350 (S.D. Cir. Ct. Sept. 28, 2004).

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

DATED: January 13, 2016

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